

| <b>UNITED STATES BANKRUPTCY COURT</b><br><b>DISTRICT OF NEW JERSEY</b><br><b>Caption in Compliance with D.N.J. LBR 9004-1(b)</b>  |   |
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| <p>In re:</p> <p><b>BLOCKFI INC., et al.,</b></p> <p style="text-align: right;">Debtors.<sup>1</sup></p>  | <p>Chapter 11</p> <p>Case No. 22-19361 (MBK)</p> <p>Jointly Administered</p>  |

<sup>1</sup> The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC. (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 201 Montgomery Street, Suite 263, Jersey City, NJ 07302.

**NOTICE OF MOTION OF THE OFFICIAL CREDITORS COMMITTEE  
REQUESTING AN ORDER REMEDYING THE DEBTORS' IMPROPER PLAN  
SOLICITATION IN VIOLATION OF BANKRUPTCY CODE SECTION 1125(b)**

**PLEASE TAKE NOTICE**, that *the date and time specified in the Order Shortening Notice*, the undersigned, as local bankruptcy counsel for the Official Committee of Unsecured Creditors (the "Committee") of BlockFi Inc., ("BlockFi" or the "Debtor"), shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, for the District of New Jersey, Courthouse, 402 East State Street, Trenton, New Jersey 08608, seeking the entry of the order submitted with this motion, and for such other relief that is just and proper.

**PLEASE TAKE FURTHER NOTICE**, that the undersigned shall rely upon the motion filed herewith in support of the relief sought.

**PLEASE TAKE FURTHER NOTICE**, that oral argument is requested.

**PLEASE TAKE FURTHER NOTICE**, that no brief is being filed herewith since the legal basis upon which relief should be granted is set forth in the Motion.

**PLEASE TAKE FURTHER NOTICE**, that all objections must be in writing and filed consistent with the *Order Shortening Notice* with the Clerk of the United States Bankruptcy Court, for the District of New Jersey, Courthouse, 402 East State Street, Trenton, New Jersey 08608, and a copy thereof must simultaneously be served upon GENOVA BURNS, LLC., Attn: Daniel M. Stolz, Esq., 110 Allen Road, Suite 304, Basking Ridge, New Jersey 07920.

Respectfully submitted,

**GENOVA BURNS, LLC**

*/s/ Daniel M. Stolz*

By: \_\_\_\_\_

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